

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

V.

ROMAN ZHIRNOV,

CRIMINAL NO. 02-CR-30043-03 MAP

**DEFENDANT ROMAN ZHIRNOV’S MOTION  
FOR DOWNWARD DEPARTURE**

Now comes the Defendant, Roman Zhirnov, in regard to the above-entitled action and herein requests this Honorable Court for a Downward Departure.

In support hereof, the Defendant Roman Zhirnov states that a downward departure is warranted, as supported by the particulars of the attached Memorandum.

Respectfully Submitted,  
The Defendant, Roman Zhirnov,  
By His Attorney,

Date: March 23, 2006

Charles J. Sclafani, Jr.  
BBO# 550411

Johnson & Sclafani  
776 Westfield Street  
West Springfield, MA 01089  
413-732-8356  
413-439-0480 FAX